

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR QUALITY  
and  
St. Joseph County Local Agency**

**NCP Coatings, Inc.  
1413 Clover Road  
Mishawaka, Indiana 46545**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F141-14569-00196	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 4, 2002  Expiration Date: January 4, 2007

## **SECTION A SOURCE SUMMARY**

- A.1 General Information [326 IAC 2-8-3(b)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
- A.4 FESOP Applicability [326 IAC 2-8-2]
- A.5 Prior Permit Conditions

## **SECTION B GENERAL CONDITIONS**

- B.1 Permit No Defense [IC 13]
- B.2 Definitions [326 IAC 2-8-1]
- B.3 Permit Term [326 IAC 2-8-4(2)]
- B.4 Enforceability [326 IAC 2-8-6]
- B.5 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]
- B.6 Severability [326 IAC 2-8-4(4)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]
- B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]
- B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]
- B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
- B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
- B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]
- B.14 Emergency Provisions [326 IAC 2-8-12]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.17 Permit Renewal [326 IAC 2-8-3(h)]
- B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
- B.19 Operational Flexibility [326 IAC 2-8-15]
- B.20 Permit Revision Requirement [326 IAC 2-8-11.1]
- B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [I13-14-2-2]
- B.22 Transfer of Ownership or Operation [326 IAC 2-8-10]
- B.23 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

## **SECTION C SOURCE OPERATION CONDITIONS**

### **Emission Limitations and Standards [326 IAC 2-8-4(1)]**

- C.1 Overall Source Limit [326 IAC 2-8]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1][IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

### **Testing Requirements [326 IAC 2-8-4(3)]**

- C.8 Performance Testing [326 IAC 3-6]

### **Compliance Requirements [326 IAC 2-1.1-11]**

- C.9 Compliance Requirements [326 IAC 2-1.1-11]

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.11 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]
- C.12 Pressure Gauge Specifications

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]**

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

- C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]
- C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Mixing Lines 1 and 2**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6 and 326 IAC 2-8-4]
- D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]
- D.1.3 PM10 Hourly Limits [326 IAC 2-8]
- D.1.4 Control Equipment Standards [326 IAC 6-3-2] [326 IAC 2-8-4]
- D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.1.6 Compliance Determination, Volatile Organic Compound Limitations
- D.1.7 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

- D.1.8 Compliance Monitoring, VOC Limitations
- D.1.9 Compliance Monitoring, Particulate Matter (PM) Limitations
- D.1.10 Broken or Failed Bag Detection

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

- D.1.11 Record Keeping Requirements
- D.1.12 Reporting Requirements

**SECTION D.2 FACILITY OPERATION CONDITIONS**

**Insignificant Activities**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

- D.2.1 Particulate Matter (PM) [326 IAC 6-2]

**Certification Form**

**Emergency Occurrence Form**

**Quarterly Report Form, Mixing Line 1**

**Quarterly Report Form, Mixing Line 2**

**Quarterly Deviation and Compliance Monitoring Report Form**

## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and St. Joseph County Local Agency. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

---

The Permittee owns and operates a paint manufacturing operation.

Authorized individual:	Sherman Drew
Source Address:	1413 Clover Road, Mishawaka, Indiana 46545
Mailing Address:	1413 Clover Road, Mishawaka, Indiana 46545
SIC Code:	2851
Source Location Status:	St. Joseph
County Status:	Attainment for PM, SO <sub>2</sub> , NO <sub>x</sub> , CO Maintenance Attainment for VOC
Source Status:	Federally Enforceable State Operating Permit (FESOP)

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

---

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) paint mixing line, identified as Mix Line #1, including three (3) paint mixer tanks, identified as Mixer #s 8, 10, and 11, and one (1) paint holding tank, identified as Tank #9, with particulate matter from the mixing line controlled by Torit Dust Collector D-1;
- (b) One (1) paint mixing line, identified as Mix Line #2, including three (3) paint mixer tanks, identified as Mixer #s 6, 7, and 12, and two (2) paint holding tanks, identified as EMAG-001 and EMAG-002, with particulate matter from the mixing line controlled by Torit Dust Collector D-1; and
- (c) Four (4) filling stations, identified as 1 through 4, and one (1) submerged filling station system, identified as ENVIROFILL-01.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

---

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) One (1) natural gas-fired boiler, identified as BH-5, with a maximum rated heat input capacity of 1.8 million British Thermal Units per hour (MMBtu/hr);
- (b) Two (2) natural gas-fired heaters, identified as H-3 and H-4, each will have a heat input capacity of 0.25 MMBtu/hr; and
- (c) Four (4) storage tanks, identified as Tank #3; Tank #4; Tank #5; and Tank PG-1, respectively;
- (d) Twelve (12) solvent tote tanks, each with a maximum capacity of 300 gallons;

- (e) Space heaters, process heaters, or boilers, with heat input equal to or less than six million (6,000,000) Btu per hour, combusting propane, liquified petroleum gas, or butane;
- (f) One (1) gasoline fuel transfer and dispensing operation, with a maximum storage capacity less than or equal to 10,500 gallons, dispensing fuel to locomotives, automobiles, or other vehicles at a rate that does not exceed 1,300 gallons per day;
- (g) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (h) Activities including the replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;
- (i) Paved and unpaved roads and parking lots with public access;
- (j) Blowdown of sight glasses, boilers, compressors, pumps and/or cooling towers; and
- (k) One (1) miscellaneous paint drum/can storage area.

**A.4 FESOP Applicability [326 IAC 2-8-2]**

---

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) a Federally Enforceable State Operating Permit (FESOP).

**A.5 Prior Permit Conditions**

---

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, and St. Joseph County Local Agency shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

## **SECTION B            GENERAL CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

---

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### **B.2      Definitions [326 IAC 2-8-1]**

---

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### **B.3      Permit Term [326 IAC 2-8-4(2)]**

---

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### **B.4      Enforceability [326 IAC 2-8-6]**

---

- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and St. Joseph County Local Agency, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by the St. Joseph County Local Agency.

### **B.5      Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

---

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### **B.6      Severability [326 IAC 2-8-4(4)]**

---

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.7      Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

---

This permit does not convey any property rights of any sort, or any exclusive privilege.

### **B.8      Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]**

---

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015,

and

St. Joseph County Local Agency  
County-City Building, Room 914  
South Bend, Indiana 46601-1870

The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, and St. Joseph County Local Agency within a reasonable time, any information that IDEM, OAQ, and St. Joseph County Local Agency may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, and St. Joseph County Local Agency copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

---

IDEM, OAQ and St. Joseph County Local Agency may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

---

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

**B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

---

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015,

and

St. Joseph County Local Agency  
County-City Building, Room 914  
South Bend, Indiana 46601-1870

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and St. Joseph County Local Agency on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and St. Joseph County Local Agency may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:



- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015,

and

St. Joseph County Local Agency  
County-City Building, Room 914  
South Bend, Indiana 46601-1870

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, St. Joseph County Local Agency upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and St. Joseph County Local. IDEM, OAQ, and the St. Joseph County local Agency may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or St. Joseph County Local Agency makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or St. Joseph County Local Agency within a reasonable time.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

---

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, St. Joseph County Local Agency, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM, OAQ:

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

St. Joseph County Local Agency:

Telephone No.: 1-219-235-9775  
Facsimile No.: 1-210-235-9497

Northern Regional Office:

Telephone No.: 1-800-753-5519  
Telephone No.: 1-219-25-4870  
Facsimile No.: 1-219-245-4877

Failure to notify IDEM, OAQ, St. Joseph County Local Agency, and Northern Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015,

and

St. Joseph County Local Agency  
County-City Building, Room 914  
South Bend, Indiana 46601-1870

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, and St. Joseph County Local Agency, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, and St. Joseph County Local Agency, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15**    **Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

---

- (a)    Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015,

and

St. Joseph County Local Agency  
County-City Building, Room 914  
South Bend, Indiana 46601-1870

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b)    A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1)    An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2)    Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee’s failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c)    Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16**    **Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

---

- (a)    This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (b)    This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or St. Joseph County Local Agency determines any of the following:

- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ or St. Joseph County Local Agency, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or St. Joseph County Local Agency, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or St. Joseph County Local Agency, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

---

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and St. Joseph County Local Agency and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015,

and

St. Joseph County Local Agency  
County-City Building, Room 914  
South Bend, Indiana 46601-1870

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and St. Joseph County Local Agency on or before the date it is due.

- (2) If IDEM, OAQ and St. Joseph County Local Agency upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and St. Joseph County Local Agency takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and St. Joseph County Local Agency, any additional information identified as needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

---

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015,  
  
and  
  
St. Joseph County Local Agency  
County-City Building, Room 914  
South Bend, Indiana 46601-1870  
  
Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Operational Flexibility [326 IAC 2-8-15]**

---

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015,

and

St. Joseph County Local Agency  
County-City Building, Room 914  
South Bend, Indiana 46601-1870,

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and St. Joseph County Local Agency, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

- (d) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.20 Permit Revision Requirement [326 IAC 2-8-11.1]**

---

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]**

---

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and St. Joseph County Local Agency U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

---

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015,

and



St. Joseph County Local Agency  
County-City Building, Room 914  
South Bend, Indiana 46601-1870

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
---------------

### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

---

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

---

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

---

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

---

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015,

and

St. Joseph County Local Agency  
County-City Building, Room 914  
South Bend, Indiana 46601-1870

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

#### **Testing Requirements [326 IAC 2-8-4(3)]**

##### **C.8 Performance Testing [326 IAC 3-6]**

---

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015,

and

St. Joseph County Local Agency  
County-City Building, Room 914  
South Bend, Indiana 46601-1870

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and St. Joseph County Local Agency not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and St. Joseph County Local Agency, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

##### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

---

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

---

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015,

and

St. Joseph County Local Agency  
County-City Building, Room 914  
South Bend, Indiana 46601-1870

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

##### **C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

---

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]  
[326 IAC 2-8-5(1)]

---

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

---

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015,  
  
and  
  
St. Joseph County Local Agency  
County-City Building, Room 914  
South Bend, Indiana 46601-1870  
  
within ninety (90) days from the date of issuance of this permit.
- (c) If the ERP is disapproved by IDEM, OAQ, and St. Joseph County Local Agency, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

- (f) Upon direct notification by IDEM, OAQ, and St. Joseph County Local Agency, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ and St. Joseph County Local Agency upon request and shall be subject to review and approval by IDEM, OAQ, and St. Joseph County Local Agency. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition.

Failure to take reasonable response steps may constitute a violation of the permit.

- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

---

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.



The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

---

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015,

and

St. Joseph County Local Agency  
County-City Building, Room 914  
South Bend, Indiana 46601-1870

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and St. Joseph County Local Agency on or before the date it is due.

**C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

---

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or St. Joseph County Local Agency makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or St. Joseph County Local Agency within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

---

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015,

and

St. Joseph County Local Agency  
County-City Building, Room 914  
South Bend, Indiana 46601-1870

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and St. Joseph County Local Agency on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. Said report(s) require(s) certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) paint mixing line, identified as Mix Line #1, including three (3) paint mixer tanks, identified as Mixer #s 8, 10, and 11, and one (1) paint holding tank, identified as Tank #9, with particulate matter from the mixing line controlled by Torit Dust Collector D-1;
- (b) One (1) paint mixing line, identified as Mix Line #2, including three (3) paint mixer tanks, identified as Mixer #s 6, 7, and 12, and two (2) paint holding tanks, identified as EMAG-001 and EMAG-002, with particulate matter from the mixing line controlled by Torit Dust Collector D-1; and
- (c) Four (4) filling stations, identified as 1 through 4.

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6 and 326 IAC 2-8-4]

The owner or operator shall limit the amount of VOCs from Mixing Lines 1 and 2, each, to 24 tons per year, based on a 12 month rolling total. Satisfaction with the requirements of this Condition shall also satisfy the requirements of Condition C.1.

#### D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

The owner or operator shall limit the particulate matter (PM) from Mixing Lines 1 and 2 to 3.53 and 3.53 pounds per hour, respectively.

#### D.1.3 PM10 Hourly Limits [326 IAC 2-8]

The owner or operator shall limit the PM10 emissions from Mixing Lines 1 and 2 to 11.30 and 11.30 pounds per hour, respectively.

#### D.1.4 Control Equipment Standards [326 IAC 6-3-2] [326 IAC 2-8-4]

To achieve compliance with the PM limits of Condition D.1.2 and the PM10 limits of Conditions C.1 and D.1.3, the owner or operator shall install baghouse D-1 and its associated capture system. Said baghouse and capture system shall be operated all times when either Mixing Lines 1 or 2, or both, are in operation, and shall be operated, at a minimum, at the parameters that achieve compliance with the limits of Conditions C.1, D.1.2, and D.1.3.

Should the owner or operator determine that baghouse D-1 or its associated capture system is not operating normally or as designed, the owner or operator shall follow the response steps specified in Condition C.15. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

#### D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

## Compliance Determination Requirements

### D.1.6 Compliance Determination, Volatile Organic Compound Limitations

---

To demonstrate compliance with the limits of Condition D.1.1, the owner or operator shall, on a monthly basis, determine the VOC emissions from all VOC containing materials used at Mixing Lines 1 and 2. The VOC emissions shall be determined for each mixing line and shall be determined utilizing the following equation.

$$\text{Tons VOC} = \text{sum} [\text{Tons Material This Month}] * 30 \text{ lb VOC/ton material} * 1/2000 \text{ ton VOC/lb VOC}$$

For the purposes of this Condition, VOC containing material is defined as any materials used at Mixing Lines 1 and 2 that contain any amount of any carbon compounds other than:

- (a) carbon monoxide,
- (b) carbon dioxide,
- (c) carbonic acid,
- (d) metallic carbides or carbonates,
- (e) ammonium carbonate, and
- (f) any of the following non-photochemically reactive hydrocarbons:
  - (1) Methane (CAS Number 74-82-8),
  - (2) Ethane (CAS Number 74-84-0),
  - (3) 1, 1, 1, trichloroethane (CAS Number 71-55-6),
  - (4) 1, 1, 1, trichloro-2, 2, 2- trifluoroethane (CAS Number 76-13-1),
  - (5) Trichlorofluoromethane (CAS Number 75-69-4),
  - (6) Dichlorodifluoromethane (CAS Number 75-71-8),
  - (7) Chlorodifluoromethane (CAS Number 75-46-7),
  - (8) Trifluoromethane (CAS Number 75-46-7),
  - (9) 1,2, dichloro 1, 1, 2, 2 tetrafluoroethane (CAS Number 132-03-72),
  - (10) Chloropentafluoroethane (CAS Number 76-15-3),
  - (11) 1, 1, 1 trifluoro 2,2 dichloroethane (CAS Number 306-83-2),
  - (12) 1, 1, 1, 2 tetrafluoroethane (CAS Number 811-97-2),
  - (13) 1, 1 dichloro 1 fluoroethane (CAS Number 1717-00-6),
  - (14) 1 chloro 1, 1 difluoroethane (CAS Number 75-68-3),
  - (15) Methylene chloride (CAS Number 75-09-2),
  - (16) 2 chloro 1, 1, 1, 2 tetrafluoroethane (CAS Number 2837-89-0),
  - (17) Pentafluoroethane (CAS Number 354-33-6),
  - (18) 1, 1, 2, 2 tetrafluoroethane (CAS Number 359-35-3),
  - (19) 1, 1, 1 trifluoroethane (CAS Number 420-46-2),
  - (20) 1, 1 difluoroethane (CAS Number 75-37-6),
  - (21) Any perfluorocarbon compounds which fall into the following classes:
    - (A) Cyclic, branched, or linear, completely fluorinated alkanes,
    - (B) Cyclic, branched, or linear, completely fluorinated ethers with no unsaturations,
    - (C) Cyclic, branched, or linear, completely fluorinated tertiary amines with no unsaturations, and
    - (D) Sulfur containing perfluorocarbons with no unsaturations and with sulfur bonds only to carbon and fluorine,
  - (22) Parachlorobenzotrifluoride (CAS Number 98-56-6),
  - (23) Cyclic, branched, or linear completely methylated siloxanes, and
  - (24) Acetone (CAS Number 67-64-1).

**D.1.7 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]**

---

To determine compliance with the limits of Conditions C.1, D.1.2, and D.1.3, the owner or operator shall, during the period between 30 and 36 months after issuance of this permit, perform PM and PM-10 testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.1.8 Compliance Monitoring, VOC Limitations**

---

To demonstrate compliance with the limits of Condition D.1.1, the owner or operator shall, on a monthly basis, record for each Mixing Line:

- (a) the amount of each VOC containing material in tons,
- (b) the total amount VOC containing material in tons, and
- (c) the estimated VOC emissions from each mixing line in tons, as required in Condition D.1.6.

**D.1.9 Compliance Monitoring, Particulate Matter (PM) and PM10 Limitations**

---

To demonstrate compliance with the limits of Conditions D.1.2, D.1.3, and D.1.4, the owner or operator shall:

- (a) perform daily visible emission notations of the stack exhaust of baghouse D-1 during normal daylight operations when either Mixing Line 1 or Mixing Line 2, or both, are in operation and the baghouse is exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process;

- (b) observe and record at least once a week, the total static pressure drop across baghouse D-1 when either Mixing Line 1 or Mixing Line 2, or both, are in operation and venting to the atmosphere.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and St. Joseph County Local Agency and shall be calibrated at least once every six (6) months.

Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across baghouse D-1 shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test; and

- (c) perform at least once each calendar quarter, an inspection of all bags of baghouse D-1 while the baghouse is venting to the atmosphere. Said inspections are optional when venting indoors. Should the owner or operator detect any defective bags, the owner or operator shall replace them.

#### **D.1.10 Broken or Failed Bag Detection**

---

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.1.11 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.1.1, the owner or operator shall on a monthly basis, maintain the following records for each Mixing Line:
  - (1) the amount of each VOC containing material in tons, as required in Condition D.1.8,
  - (2) the total amount VOC containing material in tons, as required in Condition D.1.8,
  - (3) the estimated VOC emissions from each mixing line in tons, as required in Condition D.1.8,
  - (4) Material Safety Data Sheets (MSDS) for all material used, and
  - (5) purchase orders and invoices of all VOC containing materials used.
- (b) To document compliance with Conditions D.1.2, D.1.3, and D.1.4, the owner or operator shall maintain a log of the daily visible emission notations, weekly pressure drop readings, and quarterly inspections, as required in Condition D.1.9.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.12 Reporting Requirements**

---

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) natural gas-fired boiler, identified as BH-5, with a maximum rated heat input capacity of 1.8 million British Thermal Units per hour (MMBtu/hr);
- (b) Two (2) natural gas-fired heaters, identified as H-3 and H-4, each will have a heat input capacity of 0.25 MMBtu/hr; and
- (c) Four (4) storage tanks, identified as Tank #3; Tank #4; Tank #5; and Tank PG-1, respectively;
- (d) Twelve (12) solvent tote tanks, each with a maximum capacity of 300 gallons;
- (e) Space heaters, process heaters, or boilers, with heat input equal to or less than six million (6,000,000) Btu per hour, combusting propane, liquified petroleum gas, or butane;
- (f) One (1) gasoline fuel transfer and dispensing operation, with a maximum storage capacity less than or equal to 10,500 gallons, dispensing fuel to locomotives, automobiles, or other vehicles at a rate that does not exceed 1,300 gallons per day;
- (g) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (h) Activities including the replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;
- (i) Paved and unpaved roads and parking lots with public access;
- (j) Blowdown of sight glasses, boilers, compressors, pumps and/or cooling towers; and
- (k) One (1) miscellaneous paint drum/can storage area.

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-2]

Pursuant to 326 IAC 6-2, the PM emissions from boiler BH-5 shall not exceed 0.6 lb PM/MMBtu.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
St. Joseph County Local Agency**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: NCP Coatings, Inc.  
Source Address: 1413 Clover Road, Mishawaka, Indiana 46545  
Mailing Address: 1413 Clover Road, Mishawaka, Indiana 46545  
FESOP No.: 141-14569-00196

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

and

**St. Joseph County Local Agency**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: NCP Coatings, Inc.  
Source Address: 1413 Clover Road, Mishawaka, Indiana 46545  
Mailing Address: 1413 Clover Road, Mishawaka, Indiana 46545  
FESOP No.: 141-14569-00196

**This form consists of 2 pages**

**Page 1 of 2**

**9** This is an emergency as defined in 326 IAC 2-7-1(12)  
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**and**

**St. Joseph County Local Agency**

**FESOP Quarterly Report**

Source Name: NCP Coatings, Inc.  
Source Address: 1413 Clover Road, Mishawaka, Indiana 46545  
Mailing Address: 1413 Clover Road, Mishawaka, Indiana 46545  
FESOP No.: 141-14569-00196  
Facility: Mixing Line 1  
Limit: 24 tons VOC/yr, based on 12 month rolling total

**Quarter:**\_\_\_\_\_ **Year:**\_\_\_\_\_

	Month 1 VOC Emissions This Month (tons)	Month 2 VOC Emissions This Month (tons)	Month 3 VOC Emissions This Month (tons)
<b>Mixing Line 1</b>			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**and**

**St. Joseph County Local Agency**

**FESOP Quarterly Report**

Source Name: NCP Coatings, Inc.  
Source Address: 1413 Clover Road, Mishawaka, Indiana 46545  
Mailing Address: 1413 Clover Road, Mishawaka, Indiana 46545  
FESOP No.: 141-14569-00196  
Facility: Mixing Line 2  
Limit: 24 tons VOC/yr, based on 12 month rolling total

**Quarter:**\_\_\_\_\_ **Year:**\_\_\_\_\_

	Month 1 VOC Emissions This Month (tons)	Month 2 VOC Emissions This Month (tons)	Month 3 VOC Emissions This Month (tons)
<b>Mixing Line 2</b>			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION AND ST. JOSEPH COUNTY LOCAL AGENCY  
  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: NCP Coatings, Inc.  
Source Address: 1413 Clover Road, Mishawaka, Indiana 46545  
Mailing Address: 1413 Clover Road, Mishawaka, Indiana 46545  
FESOP No.: 141-14569-00196

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9** NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

**9** THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Quality

## Addendum to the Technical Support Document for a Federally Enforceable State Operating Permit

**Source Name:** NCP Coatings, Inc.  
**Source Location:** 1413 Clover Road, Mishawaka, Indiana  
**County:** St. Joseph  
**SIC Code:** 2851  
**Operation Permit No.:** 141-14569-00196  
**Permit Reviewer:** SDF

On November 13, 2001, the Office of Air Quality (OAQ) had a notice published in the South Bend Tribune in South Bend, Indiana, stating that NCP Coatings, Inc. had applied for a permit to produce a new coating at paint manufacturing line (#1). The notice also stated that the OAQ proposed to issue a permit for this modification and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The Office of Air Quality (OAQ) has determined that the following changes are necessary:

### 1. Change 1:

Condition D.1.2 shall be amended as follows to take out the reference that satisfaction of the 326 IAC 6-3-2 limit will also satisfy the PM10 limit of 326 IAC 2-8.

#### D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

The owner or operator shall limit the particulate matter (PM) from Mixing Lines 1 and 2 to 3.53 and 3.53 pounds per hour, respectively. ~~Satisfaction of the requirements of this condition shall satisfy the PM10 requirements of Condition C.1.~~

### 2. Change 2:

A new Condition (Condition D.1.3) shall be established as follows to provide the standards that must be achieved during compliance stack testing.

#### D.1.3 PM10 Hourly Limits [326 IAC 2-8]

**The owner or operator shall limit the PM10 emissions from Mixing Lines 1 and 2 to 11.30 and 11.30 pounds per hour, respectively.**

The above hourly PM10 emission limits are determined by taking the annual 99 tons/yr limit, converting it to an pound per hour equivalent, and then dividing the hourly level by two, allocating half of the allowable emissions to Line 1 and half to Line 2.

$$\begin{aligned} 99 \text{ tons PM}_{10}/\text{yr} * 2000 \text{ lb/ton} * 1/8760 \text{ yr/hr} &= 22.60 \text{ lb PM}_{10}/\text{hr} \\ [ 22.60 \text{ lb PM}_{10}/\text{hr} ] / [ 2 ] &= 11.30 \text{ lb PM}_{10}/\text{hr} \end{aligned}$$

In addition, Conditions D.1.3 (now D.1.4), D.1.6 (now D.1.7), D.1.8 (now D.1.9), and D.1.10(b) (now D.1.11(b)) shall be amended as follows to include new Condition D.1.3.

**D.1.34 Control Equipment Standards [326 IAC 6-3-2] [326 IAC 2-8-4]**

To achieve compliance with the PM limits of Condition D.1.2 and the PM10 limits of Conditions C.1 **and D.1.3**, the owner or operator shall install baghouse D-1 and its associated capture system. Said baghouse and capture system shall be operated all times when either Mixing Lines 1 or 2, or both, are in operation, and shall be operated, at a minimum, at the parameters that achieve compliance with the limits of Conditions C.1, ~~and D.1.2~~, **and D.1.3**.....

**D.1.67 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]**

To determine compliance with the limits of Conditions C.1, ~~and D.1.2~~, **and D.1.3**, the owner or operator shall, during the period between 30 and 36 months after issuance of this permit, perform PM and PM-10 testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

**D.1. 89 Compliance Monitoring, Particulate Matter (PM) and PM10 Limitations**

To demonstrate compliance with the limits of Conditions D.1.2, ~~and D.1.3~~, **and D.1.4**, the owner or operator shall: .....

Change to Condition D.1.11(b):

.....(b) To document compliance with Conditions D.1.2, ~~and D.1.3~~, **and D.1.4**, the owner or operator shall maintain a log of the daily visible emission notations, weekly pressure drop readings, and quarterly inspections, as required in Condition D.1.9.....

All other conditions shall be renumbered accordingly.

On December 12, 2001, D & B Environmental Services for NCP Coatings, Inc. submitted the following comments. A summary of these comments and the corresponding responses are as follows:

**3. Comment 3:**

Condition A.2(c) should say four (4) filling stations, identified as 1 through 4 and one (1) submerged filling station system identified as ENVIROFILL-01.

**Response 3:**

Condition A.2(c) shall be amended as follows, as requested.

(c) Four (4) filling stations, identified as 1 through 4, **and one (1) submerged filling station system, identified as ENVIROFILL-01.**

**4. Comment 4:**

The two boilers (combined capacity of 9.0 MMBtu/hr) listed in Condition A.3(a) will be replaced by one boiler with a capacity of 1.8 MMBtu/hr. Therefore Condition A.3(a) should be replaced by the following:

one (1) natural gas fired boiler, with a maximum rated capacity of 1.8 MMBtu/hr, identified as BH-5.



**Response 4:**

Condition A.3(a) shall be amended as follows, as requested.

- (a) ~~Two~~ **One (21)** natural gas-fired boilers, identified as BH-~~51~~ and BH-~~2~~ ~~each will have~~, **with a maximum rated a** heat input capacity of ~~4.5~~**1.8** million British Thermal Units per hour (MMBtu/hr);

In addition, condition D.2.1 shall be changed to reflect only one boiler. The 326 AC 6-2-4 limit in Condition D.2.1 shall still be 0.6 lb PM/MMBtu because pursuant to the rule, the limit for boilers less than 10 MMBtu/hr shall not exceed 0.6 lb PM/MMBtu.

Since the boiler PM emission rate 0.0019 lb/MMBtu is less than the limit of 0.6 lb/MMBtu, boiler BH-5 is determined to be in compliance with the rule.

D.2.1 Particulate Matter (PM) [326 IAC 6-2]

Pursuant to 326 IAC 6-2, the PM emissions from boilers BH-~~45~~ and BH-~~2~~ shall not exceed 0.6 lb PM/MMBtu, ~~each~~.

In addition, the unit description of Section D.2 shall be changed to reflect that there is now only one boiler.

**5. Comment 5:**

Also, add twelve 300 gallon onsite tote tanks with a total maximum of no more 3,600 gallons per year containing various solvents.

**Response 5:**

Upon review of the emission data supplied by NCP coatings, it is determined that the VOC/HAP emissions from each tank utilizing the EPA Tanks 4 program is estimated to be 7.6 lb/yr, or 0.004 ton/yr.

$$7.6 \text{ lb VOC(HAP)/yr} * 1/2000 \text{ ton/yr} = 0.004 \text{ ton VOC(HAP)/yr}$$

The combined total VOC(HAP) emissions from all 12 tanks are estimated to be 0.05 tons/yr.

$$0.004 \text{ ton VOC(HAP)/yr} * 12 = 0.05 \text{ ton VOC(HAP)/yr}$$

Since the VOC(HAP) emissions are less than the applicable insignificant activity levels, the tote tanks shall be incorporated into the permit in the insignificant activities list of Condition A.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) One (1) natural gas-fired boiler, identified as BH-5, with a maximum rated heat input capacity of 1.8 million British Thermal Units per hour (MMBtu/hr);
- (b) Two (2) natural gas-fired heaters, identified as H-3 and H-4, each will have a heat input capacity of 0.25 MMBtu/hr; and
- (c) Four (4) storage tanks, identified as Tank #3; Tank #4; Tank #5; and Tank PG-1, respectively;  
**and**

**(d) Twelve (12) solvent tote tanks, each with a maximum capacity of 300 gallons.**

In addition, the unit description of Section D.2 shall be changed to include the new tote tanks.

**Comment 6:**

Please add the following insignificant activities to the insignificant activities list of Condition A.3:

- (1) Space heaters, process heaters, or boilers, with heat input equal to or less than six million (6,000,000) Btu per hour, combusting propane, liquified petroleum gas, or butane.
- (2) One (1) gasoline fuel transfer and dispensing operation, with a maximum storage capacity less than or equal to 10,500 gallons, dispensing fuel to locomotives, automobiles, or other vehicles at a rate that does not exceed 1,300 gallons per day.
- (3) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (4) Activities including the replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.
- (5) Paved and unpaved roads and parking lots with public access.
- (6) Blowdown of sight glasses, boilers, compressors, pumps and/or cooling towers.
- (7) One (1) miscellaneous paint drum/can storage area.
- (8) miscellaneous onsite propane powered fork lifts.

**Response 6:**

The listed insignificant activities, except the fork lifts, shall be added to the insignificant activities list of Condition A.3 as requested. The fork lifts are not included because these are mobile units that are not regulated.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) One (1) natural gas-fired boiler, identified as BH-5, with a maximum rated heat input capacity of 1.8 million British Thermal Units per hour (MMBtu/hr);
- (b) Two (2) natural gas-fired heaters, identified as H-3 and H-4, each will have a heat input capacity of 0.25 MMBtu/hr; and
- (c) Four (4) storage tanks, identified as Tank #3; Tank #4; Tank #5; and Tank PG-1, respectively;
- (d) Twelve (12) solvent tote tanks, each with a maximum capacity of 300 gallons-;
- (e) Space heaters, process heaters, or boilers, with heat input equal to or less than six million (6,000,000) Btu per hour, combusting propane, liquified petroleum gas, or butane;**
- (f) One (1) gasoline fuel transfer and dispensing operation, with a maximum storage capacity less than or equal to 10,500 gallons, dispensing fuel to locomotives, automobiles, or other vehicles at a rate that does not exceed 1,300 gallons per day;**
- (g) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;**
- (h) Activities including the replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;**

- (i) Paved and unpaved roads and parking lots with public access;**
- (j) Blowdown of sight glasses, boilers, compressors, pumps and/or cooling towers; and**
- (k) One (1) miscellaneous paint drum/can storage area.**

In addition, the unit description of Section D.2 shall be changed to include the additional insignificant activities.

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) (Nonconfidential Version)

#### Source Background and Description

Source Name: NCP Coatings, Inc.  
 Source Location: 1413 Clover Road, Mishawaka, Indiana  
 County: St. Joseph  
 SIC Code: 2851  
 FESOP No.: 141-14569-00196  
 Permit Reviewer: SDF

The Office of Air Quality (OAQ) has reviewed an application from NCP Coatings, Inc. relating to the production of a new coating at paint manufacturing line (#1). This approval will supersede existing exemption 12484, issued November 11, 2000. The entire source shall consist of the following equipment:

- (a) Two (2) natural gas-fired boilers, identified as BH-1 and BH-2 each will have a heat input capacity of 4.5 million British Thermal Units per hour (MMBtu/hr);
- (b) Two (2) natural gas-fired heaters, identified as H-3 and H-4, each will have a heat input capacity of 0.25 MMBtu/hr;
- (c) Four (4) storage tanks, identified as Tank #3; Tank #4; Tank #5; and Tank PG-1, respectively;
- (d) One (1) paint mixing line, identified as Mix Line #1, including three (3) paint mixer tanks, identified as Mixer #s 8, 10, and 11, and one (1) paint holding tank, identified as Tank #9, with particulate matter from the mixing line controlled by Torit Dust Collector D-1;
- (e) One (1) paint mixing line, identified as Mix Line #2, including three (3) paint mixer tanks, identified as Mixer #s 6, 7, and 12, and two (2) paint holding tanks, identified as EMAG-001 and EMAG-002, with particulate matter from the mixing line controlled by Torit Dust Collector D-1; and
- (f) Four (4) filling stations, identified as 1 through 4.

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
BH-1	Boiler	15	0.5	Unknown	200
BH-2	Boiler	15	0.5	Unknown	200
H-3	Unit Heater	15	0.5	Unknown	200
H-4	Unit Heater	15	0.5	Unknown	200

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the operation of the plant as proposed be approved. This recommendation is based on the following facts and conditions:  
Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 9, 2001, with additional information received on August 15, 2001.

### Emission Calculations

See the confidential version of the Technical Support Document (TSD) for detailed calculations. The following tables summarize the source emissions:

#### UNRESTRICTED POTENTIAL TO EMIT (UPTE):

The following table lists the source UPTE.

	PM tons/yr	PM10 tons/yr	SO2 tons/yr	NOx tons/yr	VOC tons/yr	CO tons/yr	Single HAPs tons/yr	Comb. HAPs tons/yr
Combustion	0.30	0.30	neg.	4.16	0.20	3.50	neg.	neg.
Storage	-	-	-	-	0.15	-	0.07	0.15
Mixing Line	66.42	66.42	-	-	99.66	-	6.35	17.09
<b>Total</b>	<b>66.72</b>	<b>66.72</b>	<b>neg.</b>	<b>4.16</b>	<b>100.01</b>	<b>3.50</b>	<b>-</b>	<b>17.24</b>

#### EMISSIONS AFTER CONTROLS:

The following table lists the source emissions after application of emission controls without application of emission limits.

	PM tons/yr	PM10 tons/yr	SO2 tons/yr	NOx tons/yr	VOC tons/yr	CO tons/yr	Single HAPs tons/yr	Comb. HAPs tons/yr
Combustion	0.33	0.33	neg.	4.16	0.20	3.50	neg.	neg.
Storage	-	-	-	-	0.15	-	0.07	0.15
Mixing Line	0.25	0.25	-	-	99.66	-	6.35	17.09
<b>Total</b>	<b>0.58</b>	<b>0.58</b>	<b>neg.</b>	<b>4.16</b>	<b>100.01</b>	<b>3.50</b>	<b>-</b>	<b>17.24</b>

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	66.42
PM-10	66.42
SO <sub>2</sub>	neg.
VOC	100.01
CO	3.50
NO <sub>x</sub>	4.16

  

HAP's	Potential To Emit (tons/year)
Worst Case Single HAP	6.35
Combined HAPs	17.24

## Justification of Approval Level

The VOC UPTTE is greater than 100 tons per year, no single HAP emissions exceed 10 tons/yr, and the combined HAP emissions do not exceed 25 tons/yr. Therefore, the source qualifies for a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8-2.

## County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	maintenance
CO	attainment
Lead	not determined

- Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- St. Joseph County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

## New Source Definition

The following is a summary of the source emissions after application of emission controls and limitations.

Unit	Source Potential to Emit After Controls (tons/year)							
	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Combustion	0.33	0.33	neg.	4.16	0.20	3.50	neg.	neg.
Storage	-	-	-	-	0.15	-	0.07	0.15
Mixing Lines	0.25	0.25	-	-	48	-	<b>6.35</b>	17.09
<b>Total</b>	<b>0.58</b>	<b>0.58</b>	<b>neg.</b>	<b>4.16</b>	<b>48.35</b>	<b>3.50</b>	<b>-</b>	<b>17.24</b>

  

PSD Major Source Levels	250	250	250	250	250	250	-	-
Part 70 Major Source Levels	-	100	100	100	100	100	10	25

- The source VOC emissions are limited to 99 tons per year, pursuant to 326 IAC 2-8-4.
- The VOC emissions from Mixing Lines 1 and 2, each, are limited to 24 tons per year to avoid the 326 IAC 8-1-6 BACT requirements.
- The PM and PM10 emissions from mixing Lines 1 and 2 are based on emissions after controls utilizing a dust collector with a 99.5% overall control efficiency.
- This new source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the 28 listed source categories.
- This new source is not a Title V major stationary source because no criteria pollutant potential to emit (PTE) exceeds the applicable level of 100 tons/yr, no single hazardous air pollutant PTE exceeds the applicable levels of 10 tons/yr, and the combined hazardous air pollutant PTE does not exceed the applicable level of 25 tons/yr.

This approval shall supersede exemption 141-12484-00196, issued November 1, 2000.

## Federal Rule Applicability

### 1. New Source Performance Standards (NSPS):

**40 CFR 60, Subpart Kb:**

40 CFR, Part 60.110b, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels ( Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 applies to each storage vessel with a capacity greater than or equal to 40 cubic meters (10,567 gallons).

- (a) Proposed storage tanks #3, #4, #5, and PG-1 are not subject to this rule, because each tank's capacity is less than 10,567 gallons.
- (b) Proposed tanks #6, #7, #8, #9, #10, #11, #12, EMAG-001, and EMAG-002, are not subject to this rule, because they will be used as process tanks and not storage tanks.

**40 CFR 60, Subpart Dc:**

40 CFR, Part 60.40c, Subpart Dc - Standard of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, for which construction, modification, or reconstruction is commenced after June 9, 1989, applies to boilers that have a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than 10 MMBtu/hr.

The proposed two (2) natural gas-fired boilers, identified as BH-1 and BH-2 are not subject to this NSPS, because each boiler's input capacity is less than 10 MMBtu/hr.

**2. National Emission Standards for Hazardous Air Pollutants (NESHAPs)**

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

**State Rule Applicability - Entire Source**

**1. 326 IAC 2-4.1 (HAP Major Sources)**

This source is not subject to the requirements of 326 IAC 2-4.1 because no single hazardous air pollutant (HAP) emissions exceed 10 tons per year, and the combined HAP emissions are less than 25 tons per year.

**2. 326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in St. Joseph County and has VOC UPTE greater than 10 tons per year.

**3. 326 IAC 5-1 (Visible Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.



## State Rule Applicability - Individual Facilities

### 1. 326 IAC 6-2 (PM Emissions for Sources of Indirect Heating)

- (a) The proposed two (2) natural gas-fired boilers, identified as BH-1 and BH-2 each with a heat input capacity of 4.5 million British Thermal Units per hour (MMBtu/hr) are subject to 326 IAC 6-2-4:

$$P_t = 1.09/Q^{0.26}$$

$$= 0.62 \text{ lb/MMBtu}$$

where:  $P_t$  = PM limit in pounds per million British Thermal Units (lb/MMBtu)  
 $Q$  = Total maximum capacity rating in MMBtu/hr = 9.00 MMBtu/hr

This limit shall in no case exceed 0.6 lb/MMBtu. Therefore the PM emission limit for each boiler shall be 0.6 lb PM/MMBtu.

The PM emission rate from the boilers is determined below:

Using natural gas for fuel:

$$1.9 \text{ lb/MMcf} * 1 \text{ MMcf}/1000 \text{ MMBtu} = 0.0019 \text{ lb/MMBtu}$$

Since the boiler PM emission rate 0.0019 lb/MMBtu is less than the limit of 0.6 lb/MMBtu, each boiler is determined to be in compliance with the rule.

- (b) The two (2) natural gas-fired heaters, identified as H-3 and H-4, each with a heat input capacity of 0.25 MMBtu/hr are not subject to 326 IAC 6-2, because they are not sources of indirect heating.

### 2. 326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from mixing lines 1 and 2 for respective process weight rates, shall be as follows:

$$E = 4.10 * (P)^{0.67}$$

where:  $E$  = PM limit (lb/hr)  
 $P$  = Process Weight Rate (tons/hr)

Process/Facility ID	PM Emission Limit (lb/hr)
1a	1.66
1b	3.53
Mixing Line 2	3.53

The hourly PM UPTE for mixing lines 1 and 2 are as follows:

Mixing Line 1:  $26.06 \text{ tons/yr} * 1/8760 \text{ yr/hr} * 2000 \text{ lb/ton} = 5.95 \text{ lb PM/hr}$   
Mixing Line 2:  $40.36 \text{ tons/yr} * 1/8760 \text{ yr/hr} * 2000 \text{ lb/ton} = 9.21 \text{ lb PM/hr}$

The hourly PM emissions after controls are as follows:

Mixing Line 1:  $2.13 \text{ lb/hr} * (1 - 0.995) = 0.01 \text{ lb PM/hr}$   
Mixing Line 2:  $9.21 \text{ lb/hr} * (1 - 0.995) = 0.05 \text{ lb PM/hr}$

The hourly PM emissions after controls are less than the 326 IAC 6-3-2 limits. Therefore compliance is determined to be achieved by utilizing emission controls.

### 3. 326 IAC 8-1-6:

Since no other Article 8 rules apply to Mixing Lines 1 and 2, and each line VOC UPTE is greater than 25 tons per year, Mixing Lines 1 and 2 are determined to be subject to the requirements of 326 IAC 8-1-6.

However, NCP Coatings, Inc. has opted to limit the VOC UPTE from Mixing Lines 1 and 2 to less than 25 tons/yr, each. Thus, 326 IAC 8-1-6 will not apply.

Since the VOC emissions based on the actual hours of operation (10.52 tons VOC/yr for Mixing Line 1 and 4.81 tons VOC/yr for Mixing Line 2) are less than their applicable level of 25 tons VOC/yr, it is determined that the VOC containing material usage can be limited such that the resultant VOC emissions are less than 25 tons/yr without requiring the source to reduce its actual production.

Based on the allowable rate of 24 tons VOC/yr and the AP-42 emission factor of 30 lb VOC/ton material, the annual material usage shall be limited as follows:

$$24 \text{ tons VOC/yr} = X \text{ tons material/yr} * 30 \text{ lb VOC/ton material} * 1/2000 \text{ ton VOC/lb VOC}$$

$$X = 1600 \text{ tons VOC containing material per year per mixing line.}$$

This limit shall be based on a straight 12 month rolling total.

### Conclusion

The operation of this paint manufacturing plant shall be subject to the conditions of the attached **FESOP 141-14569-00196**.